



State of Rhode Island
Division of Public
Utilities & Carriers

Administration
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September 10, 2019

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 3533

Dear Ms. Massaro,

The Division is in receipt of an Amended Petition of Cox Rhode Island Telcom, L.L.C. ("Cox") for Relinquishment of its Designation as an Eligible Telecommunications Carrier in Rhode Island dated September 6, 2019 ("Amended Petition"). The Division submits these further comments in connection with the Amended Petition.

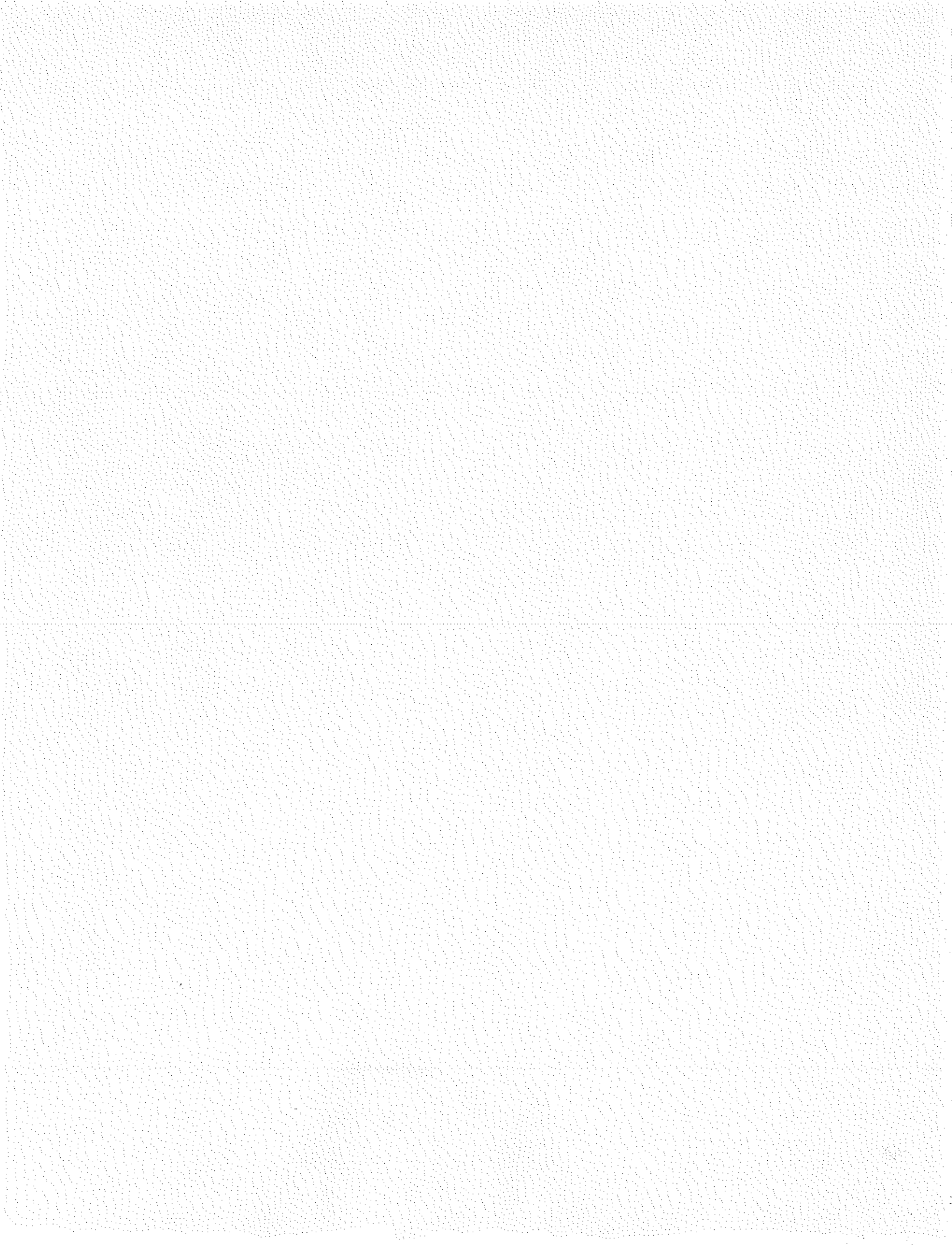
Subsequent to the receipt of the Division's Comments dated July 12, 2019, the Division met with representatives of Cox to discuss the recommendations contained in the Division's Comments. As a result of this meeting, Cox provided a Supplemental Response to Division 1-1. In its supplemental response, Cox explained that it could not transition customers to the discounted rate as the Division recommended because Section 258 of the Communications Act and Section 201(b) of the Act as well as Part 64 of FCC regulations bar service providers from switching a customer's service provider or placing features/products/services on an account without the consent of the customer. In view of potential rate impacts that could be sustained by customers, *see Division Comments dated July 12, 2019 at 3-4*, Cox decided to withdraw the proposed promotional service offering in its Amended Petition.

In addition, in its Amended Petition, Cox addressed the Division's principal concerns regarding the form of the notice/bill insert that Cox intended to provide to customers, *see Amended Petition - Exhibit B*, and responded to a number of other questions of the Division regarding the Amended Petition. *See E-mail Correspondence from Cox to the Division dated August 20, 2019 attached hereto.*

In the Division's opinion, in its amended filing, Cox has met its burden of satisfying the requirements of 47 U.S.C. § 214(e)(4) as well as the applicable regulations 47 C.F.R. § 54.205(a) & (b). Accordingly, the Division does not object to the Amended Petition as filed.

Very truly yours,

Leo J. Wold
Deputy Chief of Legal Services, DPUC



Wold, Leo (DPUC)

From: Shoer, Alan <AShoer@apslaw.com>
Sent: Wednesday, August 28, 2019 4:11 PM
To: Wold, Leo (DPUC)
Cc: Kogut, Thomas (DPUC); Robert J. Howley (robert.howley@cox.com); Sandall, Scott (CCI-Northeast)
Subject: [EXTERNAL] : RE: Docket 3533
Attachments: 20190826 RHI LL DISC DRAFT 2.pdf; Cox RI Telcom LLC Amended ETC Rel Petition DRAFT RED LINE.DOCX; [Dkt No. 3533] Cox Suppl. Resp to Div 1-1 and Div 1-15 dated 8-28-2019.pdf

Leo/Tom

Responding to your questions highlighted in red below.

Take a look and let us know if you have any other questions or thoughts. We'd like to file the amended petition (draft attached) as soon as possible so appreciate feedback when you can. Thanks.

ALAN M. SHOER

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From: Wold, Leo (DPUC) [<mailto:Leo.Wold@dpuc.ri.gov>]

Sent: Tuesday, August 20, 2019 3:39 PM

To: Shoer, Alan <AShoer@apslaw.com>

Subject: Docket 3533

Dear Alan,

Thank you for forwarding Cox's draft amended petition in advance of filing. The Advocacy Section has a couple of inquiries / comments regarding the draft.

- At our meeting of August 8, 2019, it was our understanding that Cox would be providing a more comprehensive response to Division 1-1. Can we still expect this response, and if so, when?

A supplemental response to Div 1-1 and 1-15 (fyi CT PURA just approved the petition today)(see attached)

- In addition, can Cox segregate the letter and the bill message into two separate exhibits, or will the entire letter constitute the bill message?

The entire letter will constitute the bill message, so only one exhibit will be utilized (revised letter attached)

- What part of the letter will be in the bill message?

The entire letter will constitute the bill message, so only one exhibit will be utilized (revised letter attached)

- Letters in words appear to be missing from 2 of the links in the proposed letter;

This was corrected, see attached

- Kindly update the 1,553 subscriber number as of the new date that Cox will stop accepting Lifeline applications; and

This will be updated on October 1, 2019

- Wouldn't Cox cease signing up new lifeline customers as of October 1, 2019 (when the letter is going out to customers), not as of November 1, 2019 (giving newly signed up customers only 30 days to find a new Lifeline service)?

Yes, Cox will cease signing up new lifeline customers as of Oct. 1st.

Again thanks for your efforts in this matter.

Very truly yours,

Leo J. Wold
Deputy Chief of Legal Services, DPUC